From: <u>Eric Scheidler</u>
To: <u>Rulescoordinator, Dhsr</u>

Subject: Comments on Proposed Rules for Abortion Clinics

Date: Thursday, January 29, 2015 1:51:00 PM

Attachments: 2015-01-29 Comments on North Carolina Abortion Clinic Regulations FINAL.pdf

Dear Ms. Pfeiffer,

Attached please find comments on the proposed rules for abortion clinics submitted on behalf of my organization, Pro-Life Action League, a national pro-life organization headquartered in Chicago.

-- Eric

Eric J. Scheidler Executive Director Pro-Life Action League

http://www.prolifeaction.org

Tel: 630-896-1200 Mobile: 773-251-8792 Fax: 630-896-1212

E-mail: eric@prolifeaction.org

Facebook: http://facebook.com/EricScheidler
Twitter: http://twitter.com/EricScheidler

From: <u>Rulescoordinator, Dhsr</u>

To: <u>Eric Scheidler</u>

Subject: RE: Comments on Proposed Rules for Abortion Clinics

Date: Thursday, January 29, 2015 3:04:00 PM

Thank you for your comments.

From: Eric Scheidler [mailto:eric@prolifeaction.org]

Sent: Thursday, January 29, 2015 1:50 PM

To: Rulescoordinator, Dhsr

Subject: Comments on Proposed Rules for Abortion Clinics

Dear Ms. Pfeiffer,

Attached please find comments on the proposed rules for abortion clinics submitted on behalf of my organization, Pro-Life Action League, a national pro-life organization headquartered in Chicago.

-- Eric

Eric J. Scheidler Executive Director Pro-Life Action League

http://www.prolifeaction.org

Tel: 630-896-1200 Mobile: 773-251-8792 Fax: 630-896-1212

E-mail: eric@prolifeaction.org

Facebook: http://facebook.com/EricScheidler
Twitter: http://twitter.com/EricScheidler

From: Jones-vessey, Kathleen
To: Randy O"Bannon

Subject: RE: [External] NC Abortion Stats 2014

Date: Tuesday, December 12, 2017 1:26:00 PM

I've dealt with Azzie Conley at DHSR. Her email is: azzie.conley@dhhs.nc.gov Phone # is: 919-855-4620. She is the Section Chief for the Acute and Home Care Licensure and Certification Section, which oversees abortion facility license renewals/applications. She should be able to help you with this.

Best of luck with your research – just let me know if you have any other questions! Kathleen

Kathleen Jones-Vessey, M.S.

Manager, Statistical Services Branch Division of Public Health, State Center for Health Statistics North Carolina Department of Health and Human Services

919 715 9692 office 919 733 8485 fax Kathleen.Jones-Vessey@dhhs.nc.gov http://www.schs.state.nc.us

222 North Dawson Street Raleigh, NC 27603

1908 Mail Service Center Raleigh, NC 27699-1900

From: Randy O'Bannon [mailto:rkobannon@nrlc.org]

Sent: Tuesday, December 12, 2017 11:24 AM

To: Jones-vessey, Kathleen < kathleen.jones-vessey@dhhs.nc.gov>

Subject: Re: [External] NC Abortion Stats 2014

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Kathleen.

Thanks very much for the detailed response. It was useful in helping me better understand the situation.

Who is the best person to contact on the abortion numbers for 2013 and 2014 at the Division of Health Services Regulation?

Randy

Randall K. O'Bannon, Ph.D. Director of Education & Research National Right to Life Educational Trust Fund On Tue, Dec 12, 2017 at 8:29 AM, Jones-vessey, Kathleen < <u>kathleen.jones-vessey@dhhs.nc.gov</u>> wrote:

Mr. O'Bannon,

I agree – reporting has definitely been a challenge for us, but one that I believe we've resolved. We've achieved our recent success by contacting all facilities on a monthly basis to get their abortion totals & then ensuring that we receive case report forms associated with their reported abortion figures. We immediately follow-up with facilities if we do not receive the appropriate number of forms within 30 days. This allows us to keep in constant contact with facilities & resolve reporting issues as they occur, before they become more systemic issues that are more difficult to resolve. As a result of these efforts, we're confident that recent figures (from CY2015 events forward) are accurate.

The way we adjudicate records, we continue to work on files for up to 8 months after the end of the calendar year period. So for CY2014 data, we began making these improvements in reporting during 2015. Some changes we see in reporting for CY2014 are likely a result of these improvements. By 2016, we had fully implemented these improvements and CY2015 data was accurate. For CY2013 abortion data, there was underreporting which was scattered throughout the year & not limited to one facility (even with the counties you note). It is not that they did not report any data to us at all, they just did not submit forms for all abortions occurring each month.

The Division of Health Services Regulation likely has more accurate figures for this time period as they only require that facilities report one figure to them (the # of abortions performed). In the past, facilities were much more compliant in this reporting than our more labor-intensive abortion form reporting requirements.

Hope this helps explain the situation. Please feel free to reach out if you have any other questions about this data.

Best regards,

Kathleen

Kathleen Jones-Vessey, M.S.

Manager, Statistical Services Branch Division of Public Health, State Center for Health Statistics North Carolina Department of Health and Human Services 919 715 9692 office 919 733 8485 fax Kathleen.Jones-Vessey@dhhs.nc.gov http://www.schs.state.nc.us 222 North Dawson Street Raleigh, NC 27603 1908 Mail Service Center Raleigh, NC 27699-1900 **From:** Randy O'Bannon [mailto:<u>rkobannon@nrlc.org</u>] **Sent:** Monday, December 11, 2017 12:53 PM **To:** Jones-vessey, Kathleen < <u>kathleen.jones-vessey@dhhs.nc.gov</u>> **Subject:** Re: [External] NC Abortion Stats 2014 **CAUTION:** External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov. Kathleen, Thanks for getting back to me so quickly.

I should point out that at this point I am less concerned with getting to most accurate number of abortions for North Carolina for 2014 than I am with identifying the basis for the reported increase over 2013. I am pretty sure that no one is 100% confident of their estimates (though Guttmacher thinks they get more complete numbers by contacting and updating and following up with the providers on their lists). North Carolina is hardly the first state to have to deal with clinics or doctors failing to report their abortions.

DHSR may give me a better picture of what actually happened, and I hope to follow up with them, but I am specifically interested in determining whether the 1,785 increase reported between 2013 and 2014 is a general increase or an artifact of increased reporting.

As I mentioned in my initial query, there were sudden large increases in Mecklenberg (+784) and Orange (+1,556) Counties that would more than account for that increase (and would imply that abortions went down in the other counties as a whole).

I am not interested in knowing the names of clinics or the exact number that they reported, but I am curious as to whether there were more clinics, or more reporting entities in those counties in 2014 than there were in 2013. I do not know what the precise format of your original intake forms, but I would imagine some records exist for each entity reporting in each county.

For example, I find like four providers in the Chapel Hill area in a simple Google search. If one or two of those reported in 2014 but not 2013, that would be a strong indication that it was increased reporting rather than increased caseload that was responsible for that increase. If on the other hand, three reported in 2013 and three in 2014, and these were the same providers, that would indicate an actual increase in patient volume.

The same issue with Mecklenburg County. Additional providers or just additional volume.

I'm hope I'm just not just missing something obvious by my unfamiliarity with your process, but it sounds to me like the available data would give us some clue here.

Again, I know that the whole process was revamped in the following year (though I had been led to believe that reporting changes were instituted in 2015 and became fully active in 2016-- your email made it sound like they first began to be initiated in 2014 but weren't fully implemented until 2015 -- what are the right dates here?), but I'm trying to get a better

handle on what occurred between 2013 and 2014.
Any additional help you can give me would be most appreciated.
Sincerely,
Randy
Randall K. O'Bannon, Ph.D.
Director of Education & Research
National Right to Life Educational Trust Fund
Washington, DC
On Wed, Dec 6, 2017 at 4:23 PM, Jones-vessey, Kathleen < kathleen.jones-vessey@dhhs.nc.gov> wrote:
Mr. O'Bannon,
Thank you for your inquiry. State Center for Health Statistics staff began working with all abortion facilities in the state to improve case reporting beginning with the calendar year 2014 reporting period, however we were unable to fully resolve reporting issues until the calendar year 2015 report period. As a result, at least some of the increase we see from 2013 to 2014 may be attributable to these efforts, but it would be difficult to enumerate the precise figures that could be related to incremental reporting improvements vs a true increase in cases.
Sorry we can't be of more assistance with this. The good news is that reporting issues have been resolved from CY2015-present, so investigating North Carolina abortion trends going forward should not pose a problem.

You might also try contacting Azzie Conley, with the NC Division of Health Services Regulation (DHSR): <u>azzie.conley@dhhs.nc.gov</u>). I'm not sure what the DHSR data release policy is, but they also collect abortion figures from their annual licensure renewal reports. She might be able to supply you with some of the information that you need, although I believe that DHSR data has a slightly different time frame (10/1 - 9/30 rather than calendar year time periods).

Feel free to get in touch if you have any questions or need any additional information.

Best regards,

Kathleen

Kathleen Jones-Vessey, M.S.

Manager, Statistical Services Branch

Division of Public Health, State Center for Health Statistics

North Carolina Department of Health and Human Services

919 715 9692 office

919 733 8485 fax

Kathleen.Jones-Vessey@dhhs.nc.gov

http://www.schs.state.nc.us

222 North Dawson Street

Raleigh, NC 27603

1908 Mail Service Center

Raleigh, NC 27699-1900

From: Randy O'Bannon [mailto:rkobannon@nrlc.org] **Sent:** Wednesday, December 06, 2017 1:18 PM

To: Jones-vessey, Kathleen < <u>kathleen.jones-vessey@dhhs.nc.gov</u>>

Subject: [External] NC Abortion Stats 2014

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December 6, 2017

Kathleen Jones-Vessey, M.S.

Manager, Statistical Services Branch

Division of Public Health, State Center for Health Statistics

North Carolina Department of Health and Human Services

Ms. Jones-Vessey,

After examining the recent abortion surveillance report from the CDC for 2014, I compared it to the previous year and found what appeared to be a one year increase of 1,785 abortions for North Carolina.

I asked the fine folks at our state affiliate, North Carolina Right to Life, spoke with former Speaker Paul Stam and Dr. Randall Williams, the former Assistant Secretary of DHHS, as to what they thought might be the reason and was eventually directed to you for some info that might explain or clarify things.

I am aware, both from those conversations and from the note that appears on your vital statistics page on reported pregnancies that abortions were underreported from 2011 to 2014, a time frame that encompasses both number sets I was examining.

As I understand it, some facilities were reporting abortions to the state licensure board but

not to state health department. I am also told that a new policy was put in place in 2015 to encourage better reporting.
When I examined the figures in more detail, comparing abortions by county (occurrence) for both 2013 and 2014, I noticed that most differences in a given county from one year to the next were generally small, a few more or few less, but there were sudden large increases in Mecklenberg (+784) and Orange (+1,556) Counties.
The increases in those two counties alone would more than account for the 1,785 difference between the 22,820 being reported to the CDC in 2013 and the 24,605 reported by the CDC for 2014 in North Carolina.
My questions are these:
1) Though the reporting policy change instituted by NC in 2015 would be expected to result in higher numbers of abortions being reported for 2015 or 2016 (even if actual numbers remained stable), is there any reason to believe that the increase recorded from 2013 to 2014 was related to better reporting?
2) Was this then just a matter of one or two clinics reporting in for 2014 that had not reported in 2013? Is there any way to definitively determine this? Or does your own memory and data tell you that there were just more abortions overall, perhaps several area clinics introducing chemical or medical abortions or somehow otherwise increasing their caseloads, some new clinic opening, etc.?
reported in 2013? Is there any way to definitively determine this? Or does your own memory and data tell you that there were just more abortions overall, perhaps several area clinics introducing chemical or medical abortions or somehow
reported in 2013? Is there any way to definitively determine this? Or does your own memory and data tell you that there were just more abortions overall, perhaps several area clinics introducing chemical or medical abortions or somehow otherwise increasing their caseloads, some new clinic opening, etc.? I understand from what I've been told about the new reporting policy that we expect to see what looks like a large increase for 2015, sustained into 2016 and this appears to be the case from what I see on your vital statistics pages. Is this all going to be a matter of a few

Randall K. O'Bannon, Ph.D.

Director of Education & Research

National Right to Life Educational Trust Fund

Washington, DC

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From: nrl.activehosted.com@emsd7.com on behalf of National Right to Life

To: Royster, Bruce

Subject: [External] Happy Mother"s Day!

Date: Sunday, May 12, 2019 11:54:47 AM

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Happy Mother's Day!

This week, on the occasion of the birth of his son Archie, Prince Harry, Duke of Sussex beamed as he celebrated the mother of his first-born child. During the birth announcement, the Prince spoke truth for all time, "How any woman does what they do is beyond comprehension, but we're both absolutely thrilled!"

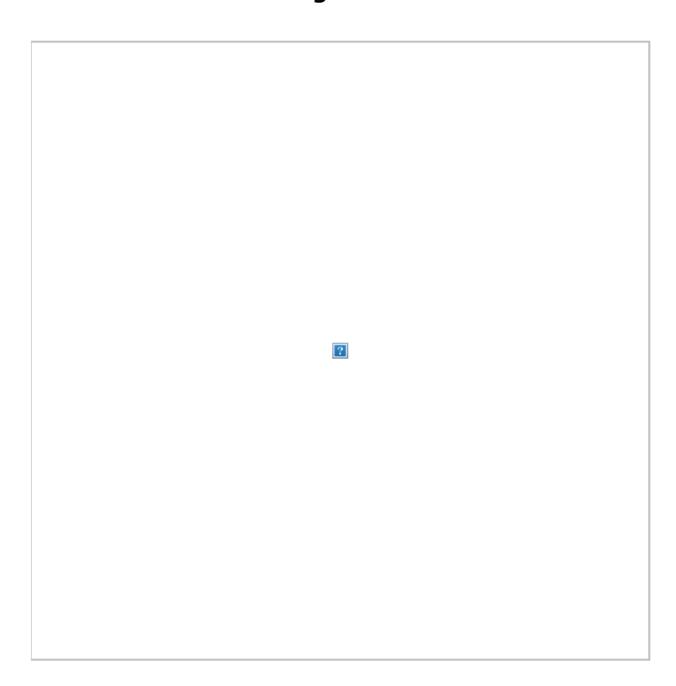
Moms giving birth may at times seem beyond comprehension because it is so miraculous, astonishing, and marvelous. And on this Mother's Day weekend, we at National Right to Life celebrate not just the Duchess of Sussex, but we recognize the importance of amazing moms everywhere.

And National Right to Life celebrates all moms! Foster moms, adoptive moms, step-moms, single moms and birth moms – all those women who selflessly love, nurture, teach, and care for their children.

We also recognize that there are too many women, who this weekend will mourn the loss of a child. Especially those who have come to regret the decision to have had an abortion deeply. They are forever in our hearts and prayers.

We at NRLC continue our daily fight so that fewer and fewer women feel the emptiness of spirit that abortion brings.

If you can, hug your mom for us this weekend – thank her for all that she has done – but mostly, **thank her for choosing life!**



Please consider donating to our life-saving efforts.



Sent to: bruce.royster@dhhs.nc.gov

Unsubscribe

From: Randy O"Bannon
To: Conley, Azzie

Subject: [External] NC Reported Abortions 2013-2014

Date: Tuesday, December 12, 2017 2:19:19 PM

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Dear Ms. Conley,

I have been discussing historical abortion statistics for North Carolina with Kathleen Jones-Vessey at the DHHS State Center for Health Statistics and she has suggested that I contact you for additional information.

This was prompted by the recent release of the U.S. Centers for Disease Control abortion surveillance report for 2014.

In comparing 2013 figures with those from 2014, I noticed a jump of 1,785 abortions for one year from North Carolina and I began checking with my contacts in the state for possible reasons for the sudden large increase.

I eventually ended up discussing the numbers Ms. Jones-Vessey and came to understand that there had been some reporting issues with regard to the state health department during that period of time, so that some providers where either not reporting or only reporting incompletely.

Some may have done a somewhat better job reporting for 2014 than 2013, owing to increased effort and follow-up from Ms. Jones-Vessey's department at DHHS, though full improvement may not have been fully achieved until 2015 or even 2016.

I expect you are already aware of all this. But I am also told that your department has its own separate count of abortions, sent in by providers as part of the ordinary regulatory process, and that your counts did not suffer from these deficiencies during those years where the DHHS's Center for Health Statistics was getting incomplete data.

Though I believe, with Ms. Jones-Vessey's help, I have a better idea of one of the causes of their statistical aberration, my picture and understanding will be more complete if I have the summary numbers from your own department's reports for those years and a few of those surrounding.

I do not know how much of your data you are at liberty to release, but even if I can only have the yearly totals of abortions reported to your department for, say, each of the years from 2011 to 2016, that would be extremely helpful.

If there are further details on the nature of those abortions -- surgical vs. medical, gestations, etc. -- that would also be helpful (though I am guessing those are more the sort of details that Ms. Jones-Vessey's department tracks).

I did see in the Center for Health Statistics reports that there were certain large increases in particular NC counties from 2013 to 2014, e.g., 784 more abortions in Mecklenburg County,

1,556 more in Orange County. If your data sheds any additional light on this (for example, showing that there was little or no actual increase in those counties, indicative that the increase was actually an artifact of improved reporting), I'd be grateful to have it in order to help clear up this mystery.

I am most appreciative of your attention in this matter.

Sincerely,

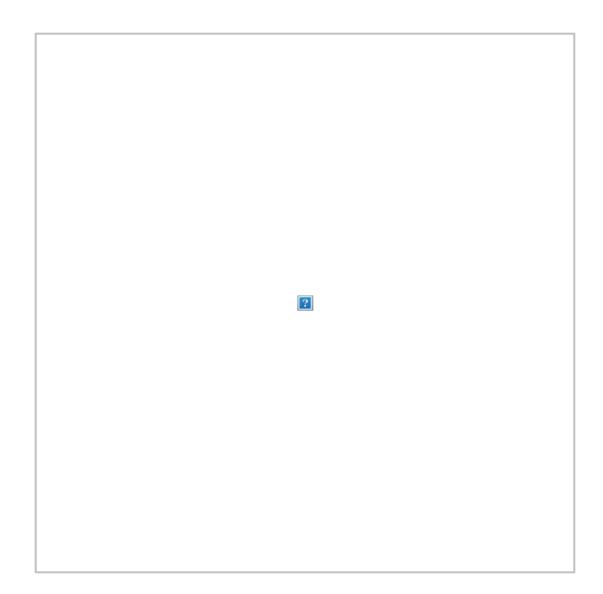
Randall K. O'Bannon, Ph.D. Director of Education & Research National Right to Life Educational Trust Fund Washington, DC From: nrl.activehosted.com@emsd7.com on behalf of National Right to Life

To: Royster, Bruce

Subject: [External] Save the Date...for the National Right to Life Academy!

Date: Wednesday, March 20, 2019 1:04:36 PM

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Your donation today to the NRLC Academy will help offset the costs of providing this critical educational service. Please consider partially or fully sponsoring an Academy Student. They are the future of the prolife movement.



Sent to: bruce.royster@dhhs.nc.gov

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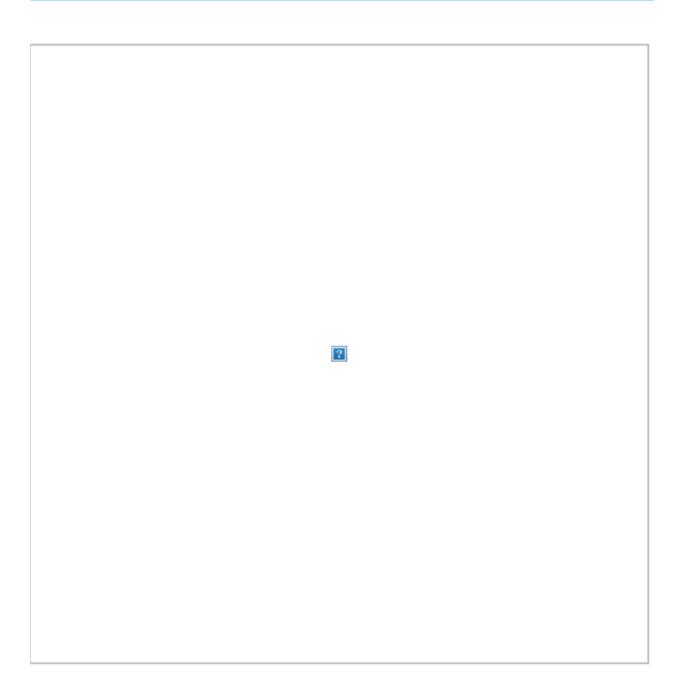
From: nrl.activehosted.com@emsd7.com on behalf of National Right to Life

To: Royster, Bruce

Subject: [External] Take Action Now! Contact the U.S. House Today!

Date: Thursday, March 7, 2019 6:12:17 PM

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Oppose H.R. 1, the So-Called "For the People Act of 2019" (restrictions on free speech) to be voted on tomorrow, March 8th.

The so-called "For the People Act of 2019" is intended to make it as difficult as possible for corporations (including nonprofit, issue-oriented groups such as National Right to Life) to spend money to communicate with the public about the actions of federal officeholders, H.R. 1 would apply an array of restrictions on ads, as well as requirements that violate the privacy rights of donors.

National Right to Life expressed its strong opposition to the bill in a <u>letter</u> sent to members of the House of Representatives on March 6, 2019 which characterized H.R. 1 as "pernicious, unprincipled, and constitutionally defective legislation." National Right to Life told House members that the overriding purpose of the legislation is "to discourage, as much as possible, disfavored groups like ours from communicating about officeholders, by exposing citizens who support such efforts to harassment and intimidation, and by smothering organizations in layer on layer of record keeping and reporting requirements, all backed by the threat of civil and criminal sanctions".

Contact the U.S. House of Representatives to urge them to oppose this legislation. Click here for more information and to take action.



Sent to: bruce.royster@dhhs.nc.gov

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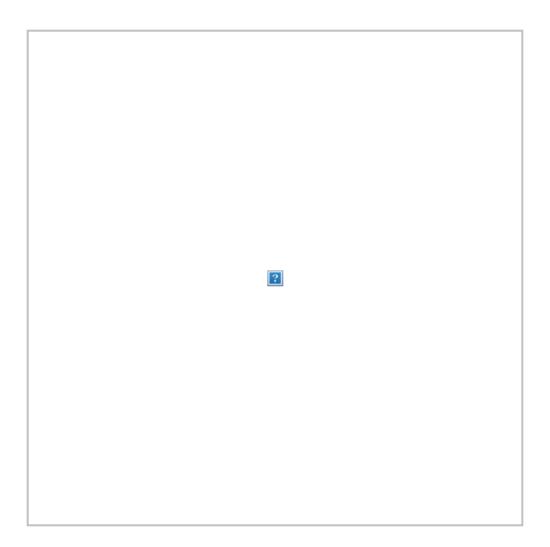
From: nrl.activehosted.com@emsd7.com on behalf of National Right to Life

To: Royster, Bruce

Subject: [External] Take Action Now! Contact the U.S. House Today!

Date: Thursday, March 28, 2019 6:14:16 PM

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Urge Your House Member to sign the discharge petition to force a vote on the Born-Alive Abortion Survivors Protection Act!

Prolife House Republican Whip Steve Scalise (R-La.) has indicated that a discharge petition for the Born-Alive Abortion Survivors Protection Act (H.R. 962) will be filed on April 2nd. If the petition is signed by a majority of House members, it will overcome the obstruction of pro-abortion Democrat leadership.

If enacted, H.R. 962 would extend federal legal protection to babies who are born alive during an abortion. Pro-life members of Congress a re using a discharge petition to attempt to force a vote on this vitally important bill that should have, but does not have, unanimous support across party

lines.

H.R. 962 is a necessary and timely response to the radical trend that started with the signing of the Reproductive Health Act by Governor Andrew Cuomo (D-N.Y.). The RHA allows abortion through all stages of pregnancy and removed explicit protections for babies born alive following a failed abortion.

Sponsored by Rep. Ann Wagner (R-Mo.), the Born-Alive Abortion Survivors Protection Act would enact an explicit requirement that a baby born alive during an abortion must be afforded "the same degree" of care that would apply "to any other child born alive at the same gestational age," including transportation to a hospital.

The bill applies the existing penalties of the federal murder statute to anyone who performs "an overt act that kills a child born alive." The bill also empowers women with a right to sue their abortionists and others for harm caused by violations of the act.

National Right to Life strongly supports the Born-Alive Abortion Survivors

Protection Act. Take action to urge your House member to sign the discharge petition to force a vote on this life-saving legislation.

Click here for more information.



Sent to: bruce.royster@dhhs.nc.gov

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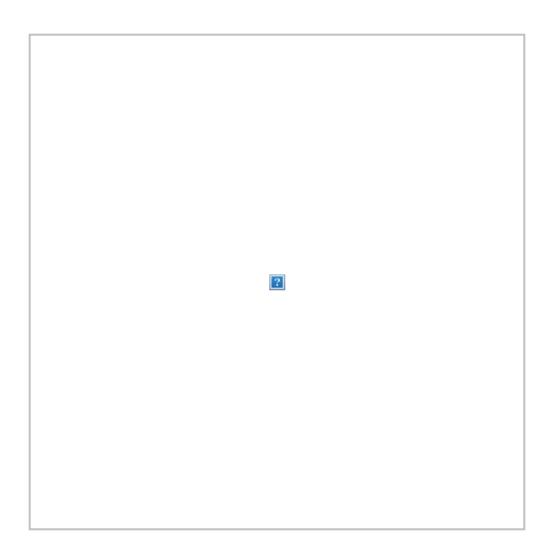
From: <u>nrl.activehosted.com@emsd7.com</u> on behalf of <u>National Right to Life</u>

To: Royster, Bruce

Subject: [External] We Need Your Help!

Date: Monday, April 1, 2019 6:44:35 PM

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Twenty-four times. That's how many times pro-abortion Democrats in the House of Representatives have blocked the Born-Alive Abortion Survivors Protection Act from even being considered.

This legislation is aimed at saving babies who have survived an attempted abortion. Babies who are squirming, crying, on a cold, hard gurney being stared down at by an abortionist.

H.R. 962 would enact an explicit requirement that a baby born alive during an abortion must be afforded "the same degree" of care that would apply "to any other child born alive at the same gestational age," including transportation to a hospital.

National Right to Life needs your help in having the Born-Alive Abortion Survivors Protection Act heard and passed.

Your donation today will help make sure we continue to save children's lives! Your continued support means WE can continue to apply pressure to those uncommitted members of Congress and be the voice the voiceless so desperately need.



House Republican Whip Steve Scalise has indicated that a discharge petition for the Born-Alive Abortion Survivors Protection Act will be filed on April 2nd, during that day's first vote series.

The support of the public is essential. PLEASE take a moment to urge your member of Congress to sign the Discharge Petition and force a vote on the Born-Alive Abortion Survivors Protection Act. Click here for more information.



Sent to: bruce.royster@dhhs.nc.gov

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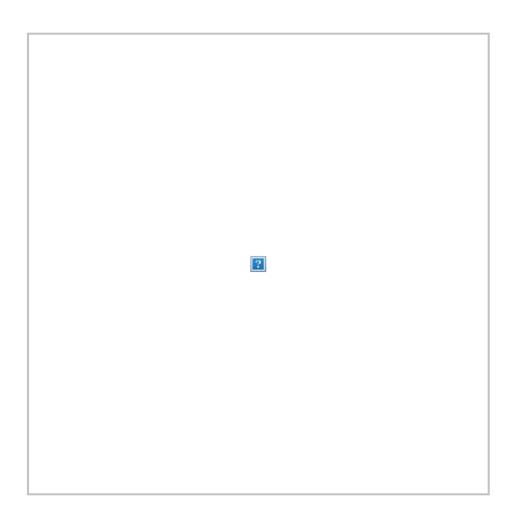
From: <u>nrl.activehosted.com@emsd7.com</u> on behalf of <u>National Right to Life</u>

To: Royster, Bruce

Subject: [External] What You Need to Remember This Easter...

Date: Saturday, April 20, 2019 8:19:58 AM

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12 And while He was being accused by the chief priests and elders, He answered nothing. **13** Then Pilate said to Him, "Do You not hear how many things they testify against You?" **14** But He answered him not one word. Matthew 27:12-14

In the hours leading to His crucifixion, Jesus was lied about, falsely accused and dehumanized. He did not speak, He offered no argument – He was defenseless. And He suffered.

Every day thousands of unborn and some newly born children suffer this exact fate. They are lied about by politicians who claim they are "just a

clump of cells," they are lied about by a blood-thirsty pro-abortion lobby that gains wealth by dehumanizing and killing them, and they suffer greatly on cold, steel gurneys gasping for breath. **Abortion and infanticide are atrocities perpetrated against the most defenseless human beings.**

Jesus' Passion was necessary because we have failed God. Christ suffered, died and was resurrected so that we could live eternally, and to save us from sin. But millions of babies die needlessly every year.

As you celebrate the Resurrected Christ this weekend, National Right to Life asks that you please also pray to end abortion.



Sent to: bruce.royster@dhhs.nc.gov

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